

### **REMARKS/ARGUMENTS**

In view of the amendments and remarks herein, favorable reconsideration and allowance of this application are respectfully requested. By this Amendment, claims 61 and 77 have been amended, claims 1-10, 12-21, 23-31, 33-50, 52-60, 75, and 79-85 have been cancelled, and claims 86-100 have been added. Thus, claims 61, 63-71, 73-74, 76-78, and 86-100 are pending for further examination.

The Examiner is thanked for providing the helpful comments and telephone interviews with the undersigned (Raymond Y. Mah) and Jonathan A. Roberts. In response to the Examiner's suggestion, Applicant has amended claim 61 to address the minor issue of form present in the "web server" recitation, and to incorporate the features of previously presented claims 75, 79, and 80. It was agreed that the claims would be favorably treated upon the proffering of such amendments. In addition to these changes to claims 61, Applicant has added new claim 86, which is a method claim that corresponds to independent system claim 61 (as well as dependent claims that correspond to those claims depending from claim 61). Thus, as suggested by the Examiner, this claim also should be favorably considered. It is understood that Applicant does not acquiesce to the outstanding rejection.

In response to the Examiner's request, Applicant submits the following brief comments that emphasize several differences between the independent claims (i.e., claims 61 and 86) and the alleged Wygodny/Haswell combination. For example, Applicant respectfully submits that the alleged Wygodny/Haswell combination, even if appropriate (which Applicant does not admit) fails to teach or suggest "a web server for storing a bug tracking system...[that] in response to received user identification information, including a password, [provides] at least one bug tracking related menu including contents which vary based on the user's role as a software

developer, software tester, or software project coordinator in a software development process.”

Indeed, as previously explained, this is an admitted deficiency of Wygodny, and Haswell, at best, merely discloses techniques for debugging already-implemented software, making plans for “migration control” of already-implemented software, and the like. As such, the alleged Wygodny/Haswell combination cannot possibly teach or suggest the above-quoted features of claim 61 (or the analogous features of claim 86), which related to software development. In addition, the Wygodny/Haswell combination fails to teach or suggest the features that have been added to claim 61 by virtue of this Amendment (and the corresponding features of claim 86). In this regard, it is noted that Wygodny does not teach varying the contents of a bug tracking menu based on a user role, and Haswell relates only to already-implemented software programs. As such, none of these features (much less their combination) is taught or suggested in Wygodny, with or without the introduction of Haswell’s teachings. Accordingly reconsideration and withdrawal of the outstanding § 103 rejections are respectfully requested.

In view of the foregoing amendments and remarks, withdrawal of the rejections and allowance of this application are earnestly solicited. Should the Examiner have any questions regarding this application, or deem that any formalities need to be addressed prior to allowance, the Examiner is invited to call the undersigned attorney at the phone number below.

KELBAUGH et al.  
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Respectfully submitted,

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